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8 Attorneys for Defendants
HSBC MORTGAGE CORPORATION (USA) AND
9 HSBC BANK USA, N.A.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 Philip Wong, Frederic Chaussy, and Leslie
14 Marie Shearn, individually, on behalf of all
15 others similarly situated, and on behalf of
the general public,

16 Plaintiffs,

17 v.

18 HSBC Mortgage Corporation (USA);
19 HSBC Bank USA, N.A.; and DOES 1
through 50, inclusive,

20 Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF HENRY YIP IN
SUPPORT OF DEFENDANTS' MOTION
FOR RULE 11(C) SANCTIONS**

Date: October 10, 2008
Time: 9:00 a.m.
Courtroom: 7 (19th Floor)
Judge: Hon. Maxine M. Chesney

1 I, Henry E. Yip, hereby declare and state:

2 1. I have personal knowledge of the facts set forth below. If called as a witness,
3 I could and would testify to the following:

4 2. I am employed by HSBC Technology & Services (USA) Inc. (hereinafter
5 "HTSU"). My job title is Director-Network Systems DSS E-Mail Operations. In my job, I oversee
6 the the email systems for various affiliates of HSBC North America Holdings, Inc. including HSBC
7 Bank USA, NA (hereinafter "HBUS") and HSBC Mortgage Corporation (USA) (hereinafter
8 "HCMU").

9 3. Attached hereto as Exhibit A is a true and correct copy of the "HSBC North
10 America Holdings, Inc. E-mail Policy," available on the corporate intranet.

11 I declare under penalty of perjury under the laws of the States of California and New
12 York and the United States of America that the foregoing declaration is true and correct to the best
13 of my personal knowledge.

14 Executed this 25th day of April 2008, in New York, New York.

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16 
17 HENRY E. YIP

18 Firmwide:85027166.1 023404.1043
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EXHIBIT A

**THIS EXHIBIT IS FILED WITH DEFENDANTS' MOTION FOR
ADMINISTRATIVE RELIEF TO FILE UNDER SEAL EXHIBITS IN SUPPORT
OF DEFENDANTS' MOTION FOR RULE 11(C) SANCTIONS**